



June 17, 2020

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
United States District Court
40 Foley Square
New York, NY 10007

Defendant's request to file a reply by June 26, 2020 is hereby granted. The sentencing currently scheduled for June 25, 2020 is adjourned to July 2, 2020 at 3 p.m.
SO ORDERED.

Re: *United States v. Michael Goliszeski*, 19-cr-00889-AJN

SO ORDERED 6/23/20

Alison J. Nathan, U.S.D.J.

Dear Judge Nathan:

On behalf of defendant Michael Goliszeski, I write to respectfully request permission to submit a reply sentencing memorandum to respond to certain aspects of the Government's sentencing submission dated June 22, 2020. This includes providing additional context to respond to the Government's characterization of a statement Mr. Goliszeski made during an interview with his employer.

Yesterday the Government provided the defense with the audio of the interview, which is over two hours long. While, in our letter dated June 17, 2020, we noted that Mr. Goliszeski is eager to proceed to sentencing on June 25, 2020, we did not have the benefit of the Government's sentencing submission when we made the request to proceed with sentencing on that date. In light of the length of the audio, we request an opportunity to submit a reply memorandum by Friday of this week, with sentencing to be held via videoconference as soon as possible thereafter at the Court's convenience. The Government does not object to the defense's request to file a reply or to adjourn sentencing.

Thank you for your consideration.

Respectfully submitted,

/s/ Kristen M. Santillo
Kristen M. Santillo
Gelber & Santillo PLLC

cc: AUSA Michael Herman